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22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN FRANCISCO

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 HASTINGS COLLEGE OF THE LAW, a
27 public trust and institution of higher education
28 duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF HEATHER WEISBROD
IN SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION TO
ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
Time: 2:00 p.m.
Place: Hon. Jon S. Tigar
Oakland Courthouse
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: Not Set

1 I, HEATHER WEISBROD, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 2. I am a Licensed Clinical Social Worker and have been employed by the San Francisco
5 Department of Public Health (“DPH”) for eighteen years. I am currently the Director the Office of
6 Coordinated Care (“OCC”) within DPH’s Behavioral Health Services Division.

7 3. In my role, I am familiar with many of the outreach programs OCC offers including the
8 Bridge and Engagement Services (“BEST”) Neighborhoods Program.

9 4. The BEST Neighborhood Program provides street-based healthcare around San
10 Francisco, including in the Tenderloin neighborhood. The program began in March 2023 and currently
11 operates six days a week, from 8 a.m. to 6 p.m.

12 5. The BEST Neighborhood Program operates on a neighborhood-based street care model,
13 in which clinicians and peer health workers perform street-based care to engage and support unhoused
14 people who have the most complex healthcare needs.

15 6. In 2023, BEST Neighborhood had 7,082 encounters with people on the street from
16 March of 2023 through the end of the year. So far in the first quarter of 2024 through March 31, 2024,
17 the BEST Neighborhoods Program has already had an additional 1,880 encounters.

18 7. The team within BEST Neighborhoods that primarily focuses on work in the
19 Tenderloin, Southern, Northern, and Central districts is the gold team. From March of 2023 through
20 the end of 2023, the gold team had 4,693 total engagements. That included 1,974 medical care
21 referrals, 324 medical care linkages, 1,397 mental health referrals, 80 mental health linkages, 1,945
22 substance use referrals, 55 substance use linkages, 1,932 shelter or housing referrals, 89 shelter or
23 housing linkages, distributing 2,300 hygiene kits or other outreach supplies, and distributing 1,234
24 narcan doses.

25 8. During the first quarter of 2024, the gold team had 1,476 total engagements. That
26 included 1,136 medical care referrals, 98 medical care linkages, 1,054 mental health referrals, 49
27 mental health linkages, 11,048 substance use referrals, 42 substance use linkages, 965 shelter or

1 housing referrals, 55 shelter or housing linkages, distributing 1,131 hygiene kits or other outreach
2 supplies, and distributing 447 narcan doses.

3 9. The BEST Neighborhoods Program has the effect of reducing the number of people
4 living on the streets in San Francisco by offering services to stabilize those in crisis who are currently
5 rejecting shelter. Once a person is in shelter it is easier for DPH to address their healthcare needs and
6 once a person is receptive to healthcare services they are often more interested in shelter. BEST
7 Neighborhoods also directly links persons experiencing homelessness to shelter and housing services.

8 10. Based on my experience at DPH and familiarity with the efforts it has taken to reduce
9 homelessness in the Tenderloin and throughout San Francisco, I believe DPH makes every effort given
10 the circumstances to achieve the goal of ensuring that every person who wants to accept shelter or
11 other City-provided services is able to do so.

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13 I declare under penalty of perjury under the laws of the United States and the State of
14 California that the foregoing is true and correct. Executed April 17, 2024 in San Francisco,
15 California.

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HEATHER WEISBROD